

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

RUBY FREEMAN and WANDREA' MOSS,

Plaintiffs,

v.

RUDOLPH W. GIULIANI,

Defendant.

No. 24-cv-06563-LJL

ANSWER

INTRODUCTION

1. Defendant denies the allegations.
2. Defendant denies the allegations.
3. Defendant denies the allegations.
4. Defendant denies the allegations.

PARTIES

5. Defendant admits the allegations.
6. Defendant admits the allegations.
7. Defendant denies the allegations.

JURISDICTION AND VENUE

8. Defendant admits the allegations.
9. Defendant denies the allegations but does not dispute the Court's personal jurisdiction.
10. Defendant admits the allegations.

FACTS

11. Defendant admits the allegations, except denies the allegations in the first sentence.

12. Defendant denies the allegations except admits that the D.C. district court entered a default judgment as to liability.

13. Defendant admits the allegations.

14. Defendant admits the allegations.

15. Defendant admits the allegations except denies Plaintiffs' characterizations of the Bankruptcy Court.

16. Defendant admits the allegations except denies the allegations in the last sentence.

17. Defendant admits the allegations.

18. Defendant admits the allegations.

19. Defendant admits the allegations.

20. Defendant admits the allegation that he filed a motion to convert his bankruptcy case from chapter 11 to chapter 7 but denies the remainder.

21. Defendant admits the allegations.

22. Defendant denies the allegations.

23. Defendant admits that on May 26, 2024, he broadcasted an episode from his Palm Beach condo but denies the remainder.

24. Defendant admits the allegations.

25. Defendant admits the allegations.

26. Defendant admits the allegations.

27. Defendant admits the allegations.

28. Defendant admits the allegations.

29. Defendant admits the allegations.
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41. Defendant admits the allegations.
42. Defendant admits the allegations.
43. Defendant admits the allegations.
44. Defendant admits the allegations.
45. Defendant admits the allegations.
46. Defendant admits the allegations.
47. Defendant admits the allegations.
48. Defendant admits the allegations.
49. Defendant denies the allegations.
50. Defendant admits the allegations.
51. Defendant admits the allegations.

- 52. Defendant admits the allegations.
- 53. Defendant admits the allegations.
- 54. Defendant admits the allegations.
- 55. Defendant admits the allegations.
- 56. Defendant admits the allegations.
- 57. Defendant admits the allegations, except denies that the affidavit “purports” to declare.
- 58. Defendant admits the allegations, except for the allegations in the last sentence.
- 59. Defendant denies the allegations.

CAUSE OF ACTION
(28 U.S.C. § 2201)

- 60. No responsive pleading is required.
- 61. Defendant admits the allegations.
- 62. Defendant denies the allegations.
- 63. Defendant denies the allegations.
- 64. Defendant denies the allegations.

AFFIRMATIVE DEFENSES

FIRST DEFENSE

- 65. The Complaint fails to state a claim upon which relief can be granted.

SECOND DEFENSE

- 66. The Court should abstain under the *Burford* abstention doctrine.

THIRD DEFENSE

- 67. The Court, in its discretion, should decline to adjudicate this declaratory judgment action.

PRAYER FOR RELIEF

WHEREFORE, Defendant prays for judgment in his favor, dismissing the Complaint and awarding such other and further relief as the Court deems just and proper.

Dated: October 16, 2024
New York, New York

Respectfully Submitted,

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